

**APPENDIX A:
KEY TO OBJECTIONS**

<u>Abbreviation</u>	<u>Objection</u>
3.e	Beyond the scope of YGR Pretrial Rule 3.e
33d	Only identifies documents pursuant to FRCP 33d; presentation would be confusing to the jury
608	Improper character/conduct evidence
701	Improper opinion testimony by lay witness
A	Assuming facts not in evidence
AMB	Ambiguous
BE	Violates best evidence rule (1002)
BSER	Beyond the scope of the expert report
F	Lacks foundation/personal knowledge (602)
H	Hearsay (801 et seq.)
IEO	Improper expert opinion (702/703)
L	Leading
LC	Calls for a legal conclusion
MIL	Subject to motion <i>in limine</i>
MISDE	Mischaracterizes the document or evidence
NAR	Calls for a narrative response
NNFF	Not necessary for fairness or completeness under FRCP 32(a) or FRE 106
NR	Counter-designated testimony is non-responsive
P	Prejudice, confusion, waste of time, misleading (403)
R	Relevance (401/402)
RCP32	Violates Rule of Civil Procedure 32
SPEC	Calls for speculation
V	Vague

**APPENDIX B:
EXCERPTS OF DISPUTED DESIGNATIONS**

Exhibit 1	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Gary Binyamin (7/30/2013)
Exhibit 2	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Gary Binyamin (11/25/2013)
Exhibit 3	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of John Borrell (01/15/2014)
Exhibit 4	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of John Borrell (9/19/2014)
Exhibit 5	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Momi Brosh (11/19/2014)
Exhibit 6	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Momi Brosh (11/20/2014)
Exhibit 7	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Tina Cheng (1/23/2014)
Exhibit 8	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Tina Cheng (11/12/2014 Deposition)
Exhibit 9	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Steven Dreaden (11/4/2014)
Exhibit 10	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Robert Farnan (9/10/2013)
Exhibit 11	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Tanhum Feld (3/25/2014)
Exhibit 12	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Tanhum Feld (11/14/2014)
Exhibit 13	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Christopher Haig (11/7/2014)
Exhibit 14	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Trial Testimony of Christopher Haig (4/14/2015)
Exhibit 15	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Eitan Konstantino (12/17/2013)
Exhibit 16	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Eitan Konstantino (11/6/2014)
Exhibit 17	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Trial Testimony of Eitan Konstantino (4/13/2015)
Exhibit 18	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Trial Testimony of Eitan Konstantino (4/21/2015)
Exhibit 19	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Jimmy Nguyen (10/29/2014)
Exhibit 20	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of GimMoey Ong (11/25/2014)
Exhibit 21	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Maria Pizarro (1/17/2014)
Exhibit 22	Disputed Excerpts from AngioScore's Designations and Defendants' Counters of the Deposition of Maria Pizarro (11/14/2014)

Exhibit 23	Disputed Excerpts from AngioScore's Designations from the Trial Testimony of Maria Pizarro (4/20/2015)
Exhibit 24	Disputed Excerpts from AngioScore's Designations from Konstantino's Interrogatory Responses
Exhibit 25	Disputed Excerpts from AngioScore's Designations from TriReme's Interrogatory Responses
Exhibit 26	Disputed Excerpts from AngioScore's Designations from Quattro's Interrogatory Responses
Exhibit 27	Disputed Excerpts from AngioScore's Designations from QT Vascular's Interrogatory Responses
Exhibit 28	Disputed Excerpts from AngioScore's Designations to Konstantino & TriReme's Responses to Requests for Admission
Exhibit 29	Disputed Excerpts from AngioScore's Designations to Quattro & QT Vascular's Responses to Requests for Admission
Exhibit 30	Disputed Excerpts from AngioScore's Designations to Defendants' Responses to Requests for Admission
Exhibit 31	Disputed Excerpts from Defendants' Designations and AngioScore's Counters of the Deposition of Robert Farnan (9/10/2013)
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Exhibit 34	Disputed Excerpts from Defendants' Designations and AngioScore's Counters of the Deposition of Tom Trotter Vol. 1 (1/7/2014)
Exhibit 35	Disputed Excerpts from Defendants' Designations and AngioScore's Counters of the Deposition of Tom Trotter Vol. 2 (8/28/2014)
Exhibit 36	Disputed Excerpts from Defendants' Designations and AngioScore's Counters of the Deposition of Tom Trotter Vol. 3 (1/9/2015)
Exhibit 37	Disputed Excerpts from AngioScore's Counter Designations to the Trial Testimony of Tom Trotter (4/15/2015)